

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

Report Date: November 17, 2004

Tennessee RSA No. 3 Limited Partnership
d/b/a Eloqui Wireless
P.O. Box 31729
Knoxville, TN 37930-1729
Phone: (865) 691-1555
John Miller, CEO

Counsel: Lukas, Nace, Gutierrez & Sachs
Pamela L. Gist, Esq.
1650 Tysons Blvd., Suite 1500
McLean, Virginia 22102
Ph. (703) 584-8665
Email: pgist@fcclaw.com

(1) Digital wireless phones tested: Carrier presently operates a TDMA cellular system but will begin to operate CDMA facilities in the next few months. Carrier acquires wireless telephone handsets manufactured by Nokia and Motorola (collectively, "Vendors"). To Carrier's knowledge, these Vendors are not presently offering any devices that are compliant with the ANSI C63.19 standard ("Compliant Phones"). Accordingly, no phone devices have been tested to date.

(2) Laboratory used: Carrier does not presently conduct internal testing of handset devices for compliance with the ANSI C63.19 standard. Carrier has not yet contemplated the means whereby such testing would be conducted. Carrier is likely to rely on its Vendors to conduct such testing, and to further rely on their representations regarding the compliance of each specific handset device.

(3) Test results for each phone tested: As indicated, no tests have been conducted to date.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: As indicated herein, Carrier has not yet identified any available handset devices that are compliant with the ANSI C63.19 U3 standard.

(5) Status of product labeling: Carrier typically relies upon its Vendors to label all products prior to their shipment to our retail locations. To Carrier's knowledge, no Vendor has made arrangements for product labeling that makes reference to HAC.

(6) Outreach efforts: When compliant phones become available they will be publicly identified for consumers and audiologists. Compliant phones will be listed on Carrier's web sites, and the information will be communicated to consumer groups. Carrier will train its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature will be provided at the point of sale, addressing the needs of individuals with hearing disabilities. Carrier will consider developing consumer education programs aimed at reaching hearing aid and cochlear implant users. Consumers will be given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids; flexible return policies will apply to consumers seeking to obtain compliant phones. Toward this end, Carrier may conduct outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services.

(7) Retail availability of compliant phones: No Compliant Phones are presently available in Carrier's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Carrier is unaware of the specific plans of its Vendors to incorporate HAC features into future phones.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Carrier is unaware of specific activities that its Vendors may be undertaking to comply with the referenced FCC Order. Carrier is ready and willing to offer compliant devices to interested customers, and will encourage its Vendors to expedite the availability of such handset devices.

(10) Number of compliant and non-compliant phone models offered at this time: Carrier's core assortment presently includes approximately four models of cellular TDMA handsets. To our knowledge, none of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any: There are no differences in handset offerings within Carrier's service area. Carrier's handset offerings are presently consistent inside the market.

(12) Ongoing efforts for interoperability testing with hearing aid devices: To date, Carrier has not conducted interoperability testing due to the non-availability of Compliant Phones.